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10 *Attorneys for Defendants*
11 *C. R. Bard, Inc. and*
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANT'S NOTICE OF
LODGING UNDER SEAL BARD'S
MOTION FOR SUMMARY
JUDGMENT AS TO PLAINTIFF
CAROL KRUSE'S CLAIMS**

(Assigned to the Honorable David G. Campbell)

CAROL KRUSE, an individual,

Plaintiff,

23 | v.

24 C. R. BARD, INC., a New Jersey
25 corporation and BARD PERIPHERAL
VASCULAR, INC., an Arizona
corporation,

Defendants.

1 Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively
2 "Bard"), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6,
3 file this Notice of Lodging Under Seal Bard's Motion for Summary Judgment as to
4 Plaintiff Carol Kruse's Claims. Bard's Motion and Memorandum of Law in Support of
5 Motion for Summary Judgment quotes, references, or characterizes Plaintiff's personal
6 healthcare information that is protected under HIPAA and confidential under the
7 Stipulated Protective Order. Defendants have notified Plaintiff of their intent to file this
8 Notice of Lodging. Because the documents lodged under seal and materials lodged
9 redacted only relate to Plaintiff's personal healthcare information, Defendants note that it
10 is Plaintiff's burden to file a motion to seal. A list of materials lodged under seal and
11 lodged redacted, are attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED this 28th day of August, 2017.

s/Richard B. North, Jr.

Richard B. North, Jr.

Georgia Bar No. 545599

Matthew B. Lerner

Georgia Bar No. 446986
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**Attorneys for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.

Nelson Mullins Riley & Scarborough

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EXHIBIT A

DOCUMENTS PROPOSED TO BE LODGED REDACTED

Defendants request they be permitted to lodge redacted portions of the following documents:

Defendants' Motion and Memorandum of Law in Support of Motion for Summary

Judgment as to Plaintiff Carol Kruse's Claims

Nelson Mullins Riley & Scarborough

Atlanta GA 30363